

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

PAUL CALDWELL,

Plaintiff,

Case No.: 2:25-cv-01557-JKS-JSA

v.

TRANSWORLD SYSTEMS INC.,

Defendant.

**DEFENDANT TRANSWORLD SYSTEMS INC.'S ANSWER AND
AFFIRMATIVE DEFENSES TO PLAINTIFF'S COMPLAINT**

NOW COMES Defendant Transworld Systems Inc. ("TSI"), by and through undersigned counsel, and for its Answer to Plaintiff's Complaint, states as follows:

TSI denies the allegations in Plaintiff's Complaint, and denies that Plaintiff is entitled to damages. TSI further denies any and all damages, liability, and/or violations to the extent alleged therein.

AFFIRMATIVE DEFENSES

FIRST AFFIRMATIVE DEFENSE

One or more of the counts/grounds in plaintiff's Complaint fails to state a claim against TSI upon which relief can be granted.

SECOND AFFIRMATIVE DEFENSE

Pursuant to 15 U.S.C. § 1692k(c), to the extent a violation(s) is established, any such violation(s) was not intentional and resulted from a *bona fide* error notwithstanding the maintenance of procedures reasonably adapted to avoid any such error.

THIRD AFFIRMATIVE DEFENSE

Any harm suffered by plaintiff was legally and proximately caused by persons, individuals, corporations, or entities beyond the control or supervision of TSI, or for whom TSI is not responsible or liable.

FOURTH AFFIRMATIVE DEFENSE

Assuming that plaintiff suffered any damages, plaintiff has failed to mitigate his damages or take other reasonable steps to avoid or reduce his damages.

FIFTH AFFIRMATIVE DEFENSE

To the extent TSI committed any violation, which it denies, such violation was not willful and was only negligent.

SIXTH AFFIRMATIVE DEFENSE

To the extent TSI accessed plaintiff's credit report, TSI had a permissible purpose for doing so.

WHEREFORE, Defendant Transworld Systems Inc. requests the Court

dismiss this action with prejudice and grant it any other relief that the Court deems appropriate.

Dated: March 7, 2025

Respectfully Submitted,

/s/ Aaron R. Easley
Aaron R. Easley, Esq.
Sessions, Israel & Shartle, LLC
3 Cross Creek Drive
Flemington, NJ 08822
Telephone: (908) 237-1660
Facsimile: (877) 334-0661
Email: aeasley@sessions.legal
Attorney for Defendant,
Transworld Systems Inc.

CERTIFICATE OF SERVICE

I hereby certify that on March 7, 2025 a copy of the foregoing was electronically filed with the Clerk of the Court, United States District Court for the District of New Jersey, and served via CM/ECF and U.S. Mail upon the following:

Paul Caldwell -Pro Se Plaintiff
158 North Maple Ave.
East Orange, NJ 07017

/s/ Aaron R. Easley
Aaron R. Easley, Esq.
Attorney for Defendant